

July 30, 2002

Mary Hanan Johnson, Hanan and Heron, PC Bank One Center, Suite 2750 100 North Broadway Avenue Oklahoma City, OK 73102

Re: Sara Stevenson v. Dr. Kula

Dear Mary:

My apologies that this letter is late, but I trust you have filed a response to this petition on behalf of Dr. Kula and Mercy Memorial Health Center (MMHC). Please send me a copy of your pleading and let me know how you intend to challenge the petition. By way of copy to Dr. Kula, I advise him that pursuant to his employment with MMHC and his participation in the SMHS Self-Insurance Program, we have engaged you and your firm to represent both Dr. Kula and MMHC. Although we have decided to provide Dr. Kula with counsel, given the nature of the allegations, we will not pay any judgment against him or settlement on his behalf since it would be predicated upon behaviors not within the course and scope of employment. I invite Dr. Kula to call me with any questions he has about this reservation of rights.

I look forward to receiving a copy of your responsive pleading and hearing about how you intend to proceed.

Best Regards

Ann Gaylor Rucker

Director, Medical-Legal Services

AGR/cls

CC:

G. Paul Kula, M.D.

330 West Gray, Suite 304

Norman, OK 73069

Lori Smith (via e-mail)

Bob Thompson (via e-mail) (

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EXHIBIT 1